and more NYNEX central offices to take advantage of the residual TIC exemption.

For example, take a DS3 dedicated transport facility between a NYNEX central office and an IXC point of presence. NYNEX charges approximately $44,000 per year for such a facility, and we understand that CAP rates are somewhat lower than this.[43] Outside of Zone 1 in LATA 132, the per-minute residual TIC will generate up to $471,000 in revenues on a DS3 facility, assuming 9,000 MOU per trunk with a fully loaded DS3 of 672 trunks. The per-minute residual TIC savings that would result from sending traffic over a CAP facility would be so great that an IXC would have absolutely no financial incentive to stay on NYNEX's Local Transport services even if NYNEX charged nothing for the DS3.[44] The lower per-minute residual TIC in LATA 132 Zone 1 would not solve the problem. It would generate approximately $145,000 per year on a DS3 facility, more than three times the cost of the facility itself. An IXC would have to be irrational to use NYNEX's DS3 service regardless of how low NYNEX priced its DS3 service. Substantially the same situation holds true for DS1 transport services, although the dollar values are different.

---

[43] *See* Affidavit of James Kane.

[44] The per-minute cost of a NYNEX DS3 facility is approximately 0.06 cents, far lower than the per-minute residual TIC. The per-minute residual TIC savings from using CAP transport easily offset the collocation cross-connection charges, which would be approximately $2,000 per year for a DS3 facility, assuming DS1 cross-connections from the switch to the collocation node.

For this reason, NYNEX expects the IXCs to shift their traffic to the CAPs as quickly as possible. This will generate substantial losses of both per-minute residual TIC revenues and Local Transport revenues for NYNEX. As noted, a large portion of NYNEX's Switched Access traffic is in central offices where the CAPs have existing or planned collocation facilities, and the Commission's order will encourage the CAPs and the IXCs to collocate in other offices as well. The *Access Charge Reform Order* was adopted in May 1997, which gives the IXCs and the CAPs over 7 months to build additional facilities and to begin rerouting trunks from NYNEX's Local Transport services to the CAPs. Since almost half of LEC residual TIC revenues will be recovered in the NYNEX region, the IXCs will get the most "bang for the buck" by concentrating their efforts there.

The loss of substantial per-minute residual TIC and Local Transport revenues will cause NYNEX irreparable harm. Reductions in revenues of this scale will not be offset by cost savings, since 90 percent of the per-minute residual TIC will be non-service related, and since the diversion of traffic will probably be concentrated on dedicated transport services, which will not save NYNEX any tandem switching costs. Even if the Commission later reversed its rule and allowed NYNEX to recover the per-minute residual TIC revenues retroactively, it could not order the IXCs to return their transport business to

NYNEX once the IXCs have rolled-over their circuits to the CAPs.[45] NYNEX would have to incur additional financial losses to provide incentives for the IXCs to shift their transport business back. NYNEX's annual revenues from dedicated transport services are approximately $50 million per year, of which $18 million is received in offices where multiplexing nodes are active or under order. NYNEX can be expected to lose substantial portions of these revenues in the very near future as a direct result of the Commission's rule. These amounts are not trivial, and they will be lost solely because the Commission has established an uneconomic rate structure that does not give NYNEX a reasonable opportunity to compete.

V. The Grant Of A Stay Will Not Harm Others

A stay, and especially a partial stay, would not harm other parties. The CAPs have competed very successfully with NYNEX in the Local Transport market despite the fact that the current TIC is considerably higher than the per-minute residual TIC. A stay would simply remove an uneconomic incentive for the IXCs to shift their traffic to the CAPs. Thus, there is no reason to assume that application of the per-minute residual TIC to CAP transport will harm competition.[46] If NYNEX applied the non-service related portion of the per-

---

[45] In addition, a retroactive rate increase of this scale would have negative impacts on industry cash flow and earnings reports and would cause undesirable rate churn.

[46] If the Commission granted a partial stay and allowed NYNEX to apply only the non-service related portion of the per-minute residual TIC to CAP transport,

minute residual TIC to CAP transport, it would not require the CAP customers to bear any of the identifiable transport costs of the LECs.

VI. The Public Interest Will Be Served By A Stay.

A stay would be in the public interest for several reasons. The Commission's rule creates such an uneconomic pricing structure that customers cannot make an accurate choice of the most efficient provider. These distortions in the marketplace will harm competition and create economic waste. If the rule were not stayed, the IXCs and the CAPs could incur the reconfiguration costs of shifting traffic to CAP transport on the basis of an unjustified pricing advantage that is later removed. A stay would avoid the substantial impact on the LECs from the loss of per-minute residual TIC and transport revenues. It would not enrich the LECs -- it would simply allow them to recover the revenues to which they are entitled under the Commission's price cap rules.

---

the CAPs would still have an advantage over NYNEX, since the IXCs would save up to 0.1 cent per minute on the per-minute residual TIC applied to CAP transport. In the DS3 example described above, the savings would be $47,100 per year on CAP transport, which is more than NYNEX's price for DS3 service alone. While NYNEX would still be at a pricing disadvantage, a partial stay would be preferable to the current rule, which gives NYNEX no practical ability to compete for Local Transport traffic.

VII. Conclusion

For these reasons, the Commission should grant a stay of its rule prohibiting the LECs from recovering the per-minute residual TIC on traffic that does not utilize LEC Local Transport services. At the very least, the Commission should grant a partial stay that would allow the LECs to apply the non-service related portion of the per-minute residual TIC on CAP transport.

Respectfully submitted,

The NYNEX Telephone Companies

By: Joseph W. Bella

Joseph Di Bella

1300 I Street, N.W., Suite 400 West
Washington, DC 20005
(202) 336-7894

Their Attorney

Dated: July 23, 1997

STAY.DOC
7/23/97 3:20 PM

AFFIDAVIT

Commonwealth of Virginia	)	
	)	ss:
	)	
City of Alexandria	)	

1. My name is Frank J. Gumper. I am Vice President, Federal Regulatory Planning, for Telesector Resources Group, a subsidiary of the NYNEX Corporation. In this position, I am responsible for formulating the NYNEX position on access charges and other federal regulatory issues before the Federal Communications Commission ("FCC").

2. Using 1996 industry pricing data and the projected effects of the Commission's access charge reform and price cap review orders, NYNEX has estimated the per-minute residual transport interconnection charges ("per-minute residual TICs") and presubscribed interexchange carrier charges ("PICCs") that will become effective on January of 1998, 1999, and 2000. The chart below shows the amount of remaining TIC revenues that will be recovered through the per-minute residual TIC and PICC rates, broken down between the amount that recovers tandem switch service-related costs and the amount that is not service-related;

Estimate of Recovery of Remaining TIC Revenues
(millions)

Per MOU Rates

	January 1998	January 1999	January 2000
LEC Industry			
Service	$255	$77	$0
Non-Service	$520	$271	$0
Total	$775	$348	$0
NYNEX			
Service	$41	$21	$0
Non-Service	$329	$236	$0
Total	$370	$257	$0

PICC Rates

LEC Industry			
Service	$50	$55	$0
Non-Service	$0	$1	$139
Total	$50	$56	$139
NYNEX			
Service	$0	$0	$0
Non-Service	$0	$0	$139
Total	$0	$0	$139

3. These data show that, on January 1, 1998, NYNEX's per-minute residual TIC rate will generate almost half of the per-minute residual TIC revenues for the entire LEC industry. Only about 11 percent of NYNEX's per-minute residual TIC will recover tandem switch service related costs. The rest represents costs that will be shifted to PICCs or be reduced by the application of the X-factor rate reductions in subsequent years. By the year 2000, all of NYNEX's service-related costs will have been shifted from the per-minute

residual TIC to NYNEX's tandem switching rate elements, and $139 million of remaining non-service related TIC costs will be recovered through the PICCs.

4. The LECs will recover varying amounts of their remaining TIC costs through per-minute residual TIC charges. Some LECs are hardly impacted at all by the Commission's decision to prohibit the LECs from applying the per-minute residual TIC to transport services of competitive access providers ("CAPs"), since they will recover most, if not all, of their remaining TIC costs through PICCs. In addition, they will be able to recover their service-related residual TIC costs through PICCs regardless of whether the LEC or a CAP provides transport services. Other LECs, like NYNEX, will recover the vast majority of their residual TIC revenues from the per-minute residual TIC, which the interexchange carriers can avoid by using CAP transport.

5. Since the rate restructure that NYNEX will implement on January 1, 1998 will be based on 1996 demand, the amounts shown above do not take into account the additional MOU that the interexchange carriers ("IXCs") will route to CAP facilities in 1997 and later in order to avoid the per-minute residual TIC. In addition, it does not take into account the additional expanded interconnection multiplexing nodes that the CAPs will establish in order to take advantage of the per-minute residual TIC exemption in offices where they are not already collocated or have not already ordered collocation facilities. Accordingly, it is extremely unlikely that NYNEX will recover the full amount of

per-minute residual TIC revenues shown above. The reduced revenues in 1998 will, in turn, reduce the revenues that can be shifted to PICC charges in subsequent years. Thus, it is highly unlikely that NYNEX will be able to recover the amount of remaining TIC revenues shown the chart above for the years 1998 to 2000.

6. I attest that the answers and information provided herein are true and correct to the best of my knowledge, information and belief.

Frank J. Gumper

Frank J. Gumper

Sworn to and subscribed
before me this 22nd day of
July, 1997 AT ALEXANDRIA, VA

Jim Balcon
NOTARY PUBLIC
MY COMMISSION EXP 11-30-2001

AFFIDAVIT

Commonwealth of Massachusetts	)	
	)	ss:
	)	
Suffolk County	)	

1. My name is James Kane. I am Director -- Access Issues Management for the Telesector Resources Group, a subsidiary of the NYNEX Corporation. In this position, I am responsible for strategic pricing decisions and analysis of major issues for NYNEX's Switched Access Services, including Local Transport services.

2. Under the FCC Part 69 Rules prior to the *Access Charge Reform Order*, the Interconnection Charge ("IC") rate element is applied to all interstate access minutes of use ("MOUs") that are switched at a LEC's end office switch, regardless of which carrier provides the local transport facilities from the end office to the interexchange carrier ("IXC") point of presence ("POP"). The provider of local transport facilities may be the LEC, or it may be a competitive access provider ("CAP"). In either case, the IC rate is billed to the IXC that orders the underlying switched access service from the LEC. Under these conditions, the IXC is likely to select a transport provider (or to provide its own transport facilities) based on a number of business and marketing factors; *e.g.* price, service quality, service features, the provider's business reputation, single vs. multiple suppliers, etc.

3. To the extent that the IC rate applies to MOUs on both LEC and CAP local transport services, it does not affect the pricing portion of the IXC's purchasing decision for local transport. However, the Commission's decision to prohibit the LECs from applying the per-minute residual transport interconnection charge ("per-minute residual TIC") to MOUs transported via CAP services that are interconnected at the LEC's end office starting January 1, 1998 will significantly reduce the "effective price" of the CAP transport as compared to the effective price for LEC transport services. The following chart illustrates this for a customer purchasing DS3 Local Transport services from a LEC end office to an IXC's POP based on the estimated per-minute residual TIC that NYNEX would apply as of January 1, 1998;

Pricing Incentives in the Marketplace

NY LATA 132 - Zone 1		Other Than NY LATA 132 - Zone 1	
Per-DS3 Costs with NYNEX		Per-DS3 Costs with NYNEX	
Facility	$ 44,000	Facility	$ 44,000
TIC/MOU	$ 145,000*	TIC/MOU	$ 471,000*
Total	$ 189,000	Total	$ 515,000
Per-DS3 Costs with CAP		Per-DS3 Costs with CAP	
Facility	$ 40,000**	Facility	$ 40,000**
LEC Conn.	$ 2,000 (1 per DS1)	LEC Conn.	$ 2,000 (1 per DS1)
Total	$ 42,000	Total	$ 42,000
Annual CAP Advantage	**$147,000**	**Annual CAP Advantage**	**$473,000**

* Assumes 9,000 MOUs per trunk with a fully loaded DS3 of 672 trunks (100% interstate).

** Assumes a 10% discount off NYNEX's rates. In addition, a $400 NRC applies in Zone 1 offices in New York.

4. As this chart shows, an IXC that purchases CAP transport in a NYNEX Zone 1 LATA 132 office would enjoy an "effective rate reduction" of $147,000 per year for each DS3 transport service, even though the NYNEX and CAP rates for the DS3 service alone are comparable. The effective rate reduction in other zones, where the per-minute residual TIC rate will be higher, would be $473,000 per DS3. The savings alone range from 3 to 10 times the price for the underlying facility. (These estimates are based on a fully-utilized facility carrying only interstate traffic. To the extent a facility is not fully loaded, these figures would be reduced, but the difference would still be significant. Where transport facilities are shared use and/or carry both interstate and intrastate switched access services, the revenues associated with those other services would also be at risk).

5. These effective price reductions would make NYNEX's switched transport services appear to be uneconomic to the IXCs, and would likely result in mass migration of services to the "apparently cheaper" CAP facilities, even though the competitor has done nothing to effect such price reductions to the IXC. Thus, it will cause the IXCs to make inefficient purchasing decisions based on incorrect pricing signals. NYNEX estimates that it has over $18 million per year in interstate direct trunk transport revenues in end offices where CAPs have collocated, or have ordered collocated facilities to be built. This revenue is

unsustainable given the impact of the Commission's per-minute residual TIC rule.

6. NYNEX has two alternatives for responding to this pricing anomaly. First, NYNEX could avoid charging the per-minute residual TIC entirely in collocated offices, which would give it the opportunity to retain Local Transport revenues. This would result in a loss of as much as $90 million in per-minute residual TIC revenues for end offices where the CAPs have already established or planned collocated transport facilities. Second, NYNEX could continue to charge the per-minute residual TIC, which would cause the IXCs to shift as much of their Local Transport business to the CAPs as possible, causing NYNEX to lose the associated residual TIC revenues. Thus, in either event, it is impossible to recover the residual TIC.

7. The only issue is how quickly the residual TIC revenues would be lost. Recent inquiries from the IXCs indicate that they fully appreciate and anticipate the windfall that they can receive by taking advantage of the exemption from the per-minute residual TIC on CAP transport services. Therefore, it is likely that the IXCs will seek to shift circuits to CAP transport as quickly as possible, starting well in advance of the January 1, 1998 effective date of the Commission's rule. In the past, NYNEX has rolled over as many as three DS3 circuits per week for a single IXC. At that rate, substantial amounts of transport traffic for the facilities-based IXCs could be rolled over to the CAPs in a relatively short time.

8. I attest that the answers and information provided herein are true and correct to the best of my knowledge, information and belief.

James Kane

James Kane

Sworn to and subscribed
before me this 23 day of
July, 1997

David A. Raney

DAVID A. RANEY
Notary Public
My Commission Expires
June 18, 1999

CERTIFICATE OF SERVICE

I hereby certify that copies of this pleading were mailed this date, first class postage prepaid, upon the persons listed on the attached service list.

Joseph Di Bella

Dated: July 23, 1997

Mr. Edward Hayes, Jr.
Attorney
1155 Connecticut Avenue, NW
3rd Floor
Washington, DC 20036

Mr. Lyman C. Welch
190 South LaSalle Street
Suite 3100
Chicago, IL 60603

Mr. John C. Smith
Aeronautical Radio, Inc.
2251 Riva Road
Annapolis, MD 21401

Mr. Paul Pandian
President
Aexs Technologies Inc.
3333 Earhart
Carrollton, TX 32230

Ms. Kathleen Abernathy
Airtouch Communications, Inc.
1818 N Street, NW
Washington, DC 20036

Ms. Pamela J. Riley
Counsel
Airtouch Communications, Inc.
One California Street
9th Floor
San Francisco, CA 94111

Ms. Mary Newmeyer
Federal Affairs Advisor
Alabama Public Service Commission
PO Box 991
Montgomery, AL 36101

Mr. Scott L. Smith
Vice President
Alaska Telephone Association
4341 B Street
Suite 304
Anchorage, AK 99503

Ms. Barbara O'Connor
Chair
Alliance for Public Technology
901 15th Street, NW
Suite 230
Washington, DC 20005

Mr. Curtis White
Managing Partner
Allied Associated Partners, LP, GELD Information Systems
4201 Connecticut Avenue, NW
Suite 402
Washington, DC 20008-1158

** Filing was hand-delivered, not sent via U.S. Mail

Ms. Diane Smith
Independent Telephone & Telecommunications Alliance
Alltel Corporate Services
655 15th Street, N.W.
Suite 220
Washington, DC 20005

Ms. Carolyn C. Hill
Alltel Corporate Services
655 15th Street, N.W.
Suite 220
Washington, DC 20005

Mr. James Keith
President
Ambox Incorporated
6040 Telephone Rd
Houston, TX 77087

Ms. Jill A. Lesser
Attorney
America Online, Inc.
1101 Connecticut Avenue, NW
Suite 400
Washington, DC 20036

Mr. John Rother
Director, Legislation & Public Policy
American Association of Retired Persons
601 E Street, NW
Washington, DC 20049

Ms. Carol Henderson
Executive Director - ALA Washington Office
American Library Association
1301 Pennsylvania Avenue, NW
Suite 403
Washington, DC 20004

Mr. Wayne Black
Keller and Heckman, LLP
American Petroleum Institute
1001 G Street, NW
Suite 500 West
Washington, DC 20001

Ms. Faye F. Henris
Counsel
America's Carriers Telecommunication Association
8180 Greensboro Drive
Suite 700
McLean, VA 22102

Mr. Michael Pabian
Counsel
Ameritech
2000 West Ameritech Center Drive
Room 4H82
Hoffman Estates, IL 60196-1025

Mr. Charles W. Trippe
Chairman and CEO
Ampro Corporation
525 John rodes Blvd.
Melbourne, FL 32934

** Filing was hand-delivered, not sent via U.S. Mail

Mr. Richard J. Metzger
General Counsel
Association for Local Telecommunications Services
1200 19th Street, NW
Suite 560
Washington, DC 20036

Mr. Gene C. Schaerr
Attorney
AT&T
1722 Eye Street, NW
Washington, DC 20006

Mr. Mark Rosenblum
Attorney
AT&T Corporation
295 North Maple Avenue
Room 3245GI
Basking Ridge, NJ 07920

Ms. Judy Sello
Attorney
AT&T Corporation
295 North Maple Avenue
Room 3245I1
Basking Ridge, NJ 07920

Mr. Jeffrey F. Beck
Attorney
Beck and Ackerman
Four Embarcadero Center
Suite 760
San Francisco, CA 94111

Mr. Edward Shakin
Attorney
Bell Atlantic Telephone Companies
1320 North Courthouse Road
Eighth Floor
Arlington, VA 22201

Mr. M. Robert Sutherland
Attorney
BellSouth Telecommunications, Inc.
1155 Peachtree Street, NE
Suite 1700
Atlanta, GA 30309-3610

Dr. Walter G. Bolter
Bethesda Reserach Institute Ltd.
P. O. Box 4044
St. Augustine, FL 32085

Mr. Benjamin H. Dickens, Jr.
Blooston, Mordkofsky, Jackson and Dickens
2120 L Street, N.W.
Suite 300
Washington, DC 20037

Mr. Glenn B. Manishin
Attorney
Blumenfeld & Cohen - Technology Law Group
1615 M Street, NW
Suite 700
Washington, DC 20036

** Filing was hand-delivered, not sent via U.S. Mail

Ms. Rachel J. Rothstein
Attorney
Cable & Wireless, Inc.
8219 Leesburg Pike
Vienna, VA 22182

Ms. Lesla Lehtonen
Counsel
California Cable Television Assn.
4341 Piedmont Avenue
Oakland, CA 94611

Mr. Lawrence Keller
Director - Federal Regulatory Services
Cathey, Hutton and Associates
3300 Holcomb Bridge Road
Suite 286
Norcross, GA 30092

Mr. Kent Larsen
Senior Manager-Financial Services
Cathey, Hutton and Associates
2711 LBJ Freeway
Suite 560
Dallas, TX 75234

Mr. Daniel Weitzner
Center for Democracy and Technology
1654 Eye Street, NW
Suite 1100
Washington, DC 20006

Dr. Jerome R. Ellig
Center for Market Processes
4084 University Dr
Suite 208
Fairfax, VA 22030

Mr. George Sollman
President and CEO
Centigram Communication Corp.
91 East Tasman Drive
San Jose, CA 95134

Mr. Wayne Leighton
Senior Economist
Citizens for a Sound Economy Foundation
1250 H Street, NW
Suite 700
Washington, DC 20005

Mr. Richard M. Tettelbaum
Associate General Counsel
Citizens Utilities Company
1400 16th Street, NW
Suite 500
Washington, DC 20036

Mr. Christopher W. Savage
Attorneys for Centennial Cellular Copororation
Cole, Raywid & Braverman, LLP
1919 Pennsylvania Avenue, NW
Suite 200
Washington, DC 20006

** Filing was hand-delivered, not sent via U.S. Mail

Mr. Thomas Crowe
Counsel
Commonwealth of the Northern Mariana Islands
2300 M Street, NW
Suite 800
Washington, DC 20037

Mr. Morton Bahr
President
Communications Workers of America
501 Third Street, NW 10th Floor
Washington, DC 20001

Mr. Ronald J. Binz
President
Competition Policy Institute
1156 15th Street, NW
Suite 310
Washington, DC 20005

Ms. Genevieve Morelli
Executive Vice President and General Counsel
Competitive Telecommunications Association
1900 M Street, NW
Suite 800
Washington, DC 20036

Mr. Randolph May
Compuserve Incorporated
1275 Pennsylvania Avenue N.W.
Suite 1000
Washington, DC 20004-2404

Mr. Allan Arlow
President and Chief Execuitve Officer
Computer & Communications Industry Association
666 11th Street NW
Washington DC, 20001

Mr. Charles Zielinski
Counsel
Computer & Communications Industry Association
607 14th Street NW
Washington DC, 20005

Dr. Mark N. Cooper
Director of Research
Consumer Federation of America
1424 16th Street, NW
Suite 604
Washington, DC 20036

Mr. James Love
Director
Consumer Project on Technology on Interconnection and Unbundling
P.O. Box 19367
Washington, DC 20036

Ms. Mary Rouleau
Legislative Director
Consumers Union
1666 Connecticut Avenue, NW
Washington, DC 20036

** Filing was hand-delivered, not sent via U.S. Mail

Ms. Blossom Peretz
Counsel
Division of Ratepayer Advocate
P.O. Box 46005
Newark, NJ 06101

Mr. Leonard J. Kennedy
Attorney for ComCast Cable Communications, Inc.
Dow, Lohnes & Albertson
1255 23rd Street, NW
Suite 500
Washington, DC 20037

Mr. Joe D. Edge
Attorney
Drinker, Biddle and Reath
901 15th Street, NW
Suite 900
Washington, DC 20005

Mr. James Schlichting **
Chief, Competitve Pricing Div.
Federal Communications Commission
1919 M Street, NW
Room 518
Washington, DC 20554

Competitve Pricing Division **
2 copies
Federal Communications Commission
1919 M Street, NW
Room 518
Washington, DC 20554

Ms. Janice Myles **
Policy & Program Planning Division
Federal Communications Commission
1919 M Street, NW
Room 544
Washington, DC 20554

Ms. Cynthia Miller
Senior Attorney
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Mr. Clint Frederick
Frederick & Warinner, L.L.C.
10901 West 84th Terrance
Suite 101
Lenexa, Kansas 66214-1631

Mr. Michael J. Shortley
Attorney
Frontier Corporation
180 South Clinton Avenue
Rochester Tel Center
Rochester, NY 14646-0700

Mr. Christopher J Wilson
Frost and Jacobs
2500 PNC Center
201 East Fifth Street
Cincinnati, OH 45202

** Filing was hand-delivered, not sent via U.S. Mail

Mr. Thomas Taylor
Attorneys for Cincinnati Bell Telephone Company
Frost and Jacobs
2500 PNC Center
201 East Fifth Street
Cincinnati, OH 45202

Ms. Kathy L. Shobert
Director, Federal Affairs
General Communications, Inc.
901 15th Street, NW
Suite 900
Washington, DC 20005

Ms. Jody B. Burton
Assistant General Counsel
General Service Adminstration
18th and F Streets, NW - Room 4002
Personal Property Division
Washington, DC 20405

Ms. Emily Hewitt
General Counsel
General Services Administration
18th & F Streets, NW
Room 4002
Washington, DC 20405

Mr. Michael J. Ettner
General Services Administration
18th and F Streets, N.W.
Room 4002
Washington, DC 20405

Mr. B.B. Knowles
Director
Georgia Public Service Commission
244 Washington St. SW
Suite 266
Atlanta, GA 30334-5701

Mr. Henry Rivera
Attorney
Ginsburg, Feldman and Bress, Chartered
1250 Connecticut Avenue, NW
Washington, DC 20036

Edwin Labergne
Attorney for Interactive Services
Ginsburg, Feldman and Bress, Chartered
1250 Connecticut Avenue, NW
Washington, DC 20036

Vincent Crivella
Associate General Counsel
Government Servies Administration
18th & F Streets NW
Room 40002
Washington DC, 20405

Tenley A. Carp
Assistant General Counsel Personal Property
Division
Government Servies Administration
18th & F Streets NW
Room 40002
Washington DC, 20405

** Filing was hand-delivered, not sent via U.S. Mail

Emily Hewitt
General Counsel
Government Servies Administration
18th & F Streets NW
Room 40002
Washington DC, 20405

Mr. Richard McKenna
GTE Service Corporation
P.O. Box 152092
HQE03J36
Irving, TX 71015-2092

Ms. Gail L. Polivy
Attorney
GTE Service Corporation
1850 M Street, NW
Suite 1200
Washington, DC 20036

Mr. Kenneth T. Burchett
Vice President
GVNW
7125 SW Hampton
Portland, OR 97223

Mr. Michael T. Skrivan
Counsel
Harris, Skrivan & Associates, L.L.C.
8801 South Yale
Suite 220
Tulsa, OK 74137

Mr. Daniel Kelley
Economic & Technology Consultants to NCTA
Hatfield Associates, Inc.
737 29th Street
Suite 200
Boulder, CO 80303

Mr. Stephen Kaufman
President and CEO
Healthtech Servies Corporation
255 Revere Drive
Suite 101
Northbrook, IL 60062

Mr. Robert M. McDowell
Counsel for Telecommunication Association
Helein & Associates
8180 Greensboro Drive
Suite 700
McLean, VA 22102

Mr. David Sieradzki
Attorney
Hogan & Hartson L. L. P
555 Thirteenth Street, N. W.
Washington, DC 20004

Mr. Peter A. Rohrbach
Attorney for Wiltel Inc.
Hogan & Hartson L. L. P
555 Thirteenth Street, N. W.
Washington, DC 20004

** Filing was hand-delivered, not sent via U.S. Mail

Mr. Michael Glasser
Hopper and Kanouff, P.C.
1610 Wynkoop Street
Suite 200
Denver, CO 80202

Ms. Cindy Schonhaut
Counsel
ICG Telecom Group
9605 East Maroon Circle
Englewood, CO 80112

Terry Michael Banks
Counsel
ICG telecom Group
1303 Sawbridge Way
Reston, VA 22094

Mr. Albert H. Kramer
Dickstein, Shapiro, Morin & Oshinsky, LLP
ICG Telecom Group, Inc.
2101 L Street, NW
Washington, DC 20037-1526

Industry Analysis Division Common Carrier Bureau
Room 534
1919 M Street NW
Washington DC, 20554

Mr. Ronald Dunn
President
Information Industry Association
1625 Massachusetts Ave. NW
Suite 700
Washington, DC 20036

Mr. James B. Wood
President
Inovonics Inc.
1304 Sair Avenue
Santa Cruz, CA 95060

Lucile M Moore
Chairman
Intelect Inc
1100 Executive Dr.
Intelect Inc.
Richardson, TX 75081

International Transcription Service
1919 M Street, NW
Room 246
Washington, DC 20554

Mr. David A. Irwin
Attorney
Irwin, Campbell and Tannenwald, P.C.
1730 Rhode Island Ave., N.W.
Washington, DC 20036

** Filing was hand-delivered, not sent via U.S. Mail

Gary L. Mann
Director - Regulatory Affairs
IXC Long Distance, Inc.
98 San Jacinto
Suite 700
Austin, Texas 78701

Mr. Michael Fox
Director Regulatory Affairs
John Staurulakis, Inc.
6315 Seabrook Rd.
Seabrook, MD 20706

Kansas Corporation Commission
1500 SW Arrowhead Rd
Topeka, KS 66604-4027

Mr. Steven A. Augustino
Attorney
Kelley Drye
1200 Nineteenth Street, N. W.
Suite 500
Washington, DC 20036

Mr. Danny E. Adams
Kelley Drye & Warren LLP
1200 19th Street, NW
Suite 500
Washington, DC 20036

Mr. Margot Smiley Humphrey
Koteen & Naftalin, Esq.
1150 Connecticut Avenue, NW, Ste. 1000
Washington, DC 20036

Sylvia Lesse
Kraskin & Lesse
2120 L Street, NW
Suite 520
Washington, DC 20037

Mr. Gary Epstein
Attorney
Latham and Watkins
1001 Pennsylvania Avenue, N.W.
Suite 1300
Washington, DC 20004

Mr. Joseph A. Lahoud
President
LC Technologies Inc
9455 Silver King Ct.
Fairfax, VA 22031

Mr. Douglas Kinkoth
LCI International Telecom
Suite 800
8180 Greensboro Drive
McLean, VA 22102

** Filing was hand-delivered, not sent via U.S. Mail